

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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INA STEINER,  
DAVID STEINER,  
STEINER ASSOCIATES, LLC,  
(*Publisher of EcommerceBytes*)

C.A. NO. 1:21-cv-11181-DPW

Plaintiffs,

v.

EBAY, INC.,  
PROGRESSIVE F.O.R.C.E. CONCEPTS, LLC,  
DEVIN WENIG,  
STEVE WYMER,  
JAMES BAUGH,  
DAVID HARVILLE,  
BRIAN GILBERT,  
STEPHANIE POPP,  
STEPHANIE STOCKWELL,  
VERONICA ZEA,  
PHILIP COOKE,  
JOHN and JANE DOE,

Defendants.

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**UNOPPOSED MOTION TO EXTEND**  
**DEFENDANTS PFC AND KRYSTEK'S FILING OF RESPONSIVE**  
**PLEADING TO PLAINTIFFS' COMPLAINT**

NOW COME the defendants, Progressive F.O.R.C.E. Concepts, Inc. and Steve Krystek, through their attorney and request that the deadline for filing a responsive pleading to the plaintiffs' complaint in the above captioned matter, be extended to on or before Friday, April 28, 2023. Defendant Krystek was only recently added to this case on March 1, 2023 (Docket 176) and Krystek was only served on March 17, 2023 (Docket 186). Plaintiffs' amended complaint is 123 pages long and comprised of 572 paragraphs. (Docket 176). The allegations as to PFC and Krystek only partially overlap, thus requiring separate motions to dismiss. Counsel for these defendants

needs additional time to complete the motions based on the new allegations in an effort to inform and assist the court and requires a very brief one-week extension to properly respond to the Amended Complaint. Plaintiffs' counsel has indicated that they will take no position on this, motion and no prejudice will result to any party by its allowance.

WHEREFORE, the defendant respectfully request that the Court grant their motion for an extension.

Respectfully submitted,  
PROGRESSIVE F.O.R.C.E. CONCEPTS, LLC,  
By Its Attorneys,

/s/ Matthew J. Holmes

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**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

The undersigned counsel for the defendant hereby certifies that he has attempted to confer with plaintiffs' counsel in this matter, in a good faith attempt to resolve or narrow the issues of dispute raised in the accompanying motion, in accordance with Local Rule 7.1 and further states that counsel for plaintiffs assents to the filing of this motion.

/s/ Matthew J. Holmes

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 21, 2023

/s/ Matthew J. Holmes